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Southern District
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April 4, 2025

By ECF

Hon. Margaret M. Garnett
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Shymell Ephron
24-Cr-418 (MMG)

It is the Court's standard practice to mark peremptory strike forms as court exhibits and file them under seal at the close of trial; that standard practice will be followed in this case.

Dated: 4/4/2025



Dear Judge Garnett:

We write to request that the Court docket the parties' respective peremptory challenge lists as a sealed court's exhibit for purposes of appeal. Since it is the movant's obligation to establish a record for purposes of a *Batson* challenge, should Mr. Ephron be convicted, we want to ensure that the Second Circuit has a clear understanding of which prospective jurors each party exercised peremptory strikes against.

Sincerely,
/s/
Hannah McCrea
Amy Gallicchio
Michael Arthus
212-417-8700

cc. (by ECF): AUSAs Ryan Allison, Lisa Daniels, and Andrew Jones